

# **EXHIBIT G**

1 UNITED STATES DISTRICT COURT  
2 FOR THE NORTHERN DISTRICT OF OHIO  
3 EASTERN DIVISION

4 IN RE: NATIONAL )  
5 PRESCRIPTION ) MDL No. 2804  
6 OPIATE LITIGATION )  
7 Case No.  
8 1:17-MD-2804  
9  
10 THIS DOCUMENT RELATES ) Hon. Dan A.  
11 TO ALL CASES ) Polster  
12

13 FRIDAY, JANUARY 4, 2019

14 HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER  
15 CONFIDENTIALITY REVIEW

16 - - -

17 Videotaped deposition of Ramona  
18 Sullins, held at the offices of JONES DAY, 77  
19 West Wacker Drive, Chicago, Illinois,  
20 commencing at 7:31 a.m., on the above date,  
21 before Carrie A. Campbell, Registered  
22 Diplomate Reporter, Certified Realtime  
23 Reporter, Illinois, California & Texas  
24 Certified Shorthand Reporter, Missouri &  
25 Kansas Certified Court Reporter.

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GOLKOW LITIGATION SERVICES  
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deps@golkow.com

1                               RAMONA SULLINS,  
2   of lawful age, having been first duly sworn  
3   to tell the truth, the whole truth and  
4   nothing but the truth, deposes and says on  
5   behalf of the Plaintiffs, as follows:

6

7                               VIDEOGRAPHER:   Please proceed.

8

9                               DIRECT EXAMINATION

10                   QUESTIONS BY MR. BOWER:

11                   Q.       Good morning, Ms. Sullins.   How  
12   are you today?

13                   A.       Doing good, thank you.

14                   Q.       Have you ever given a  
15   deposition before?

16                   A.       No.

17                   Q.       So I'm sure your attorney  
18   informed you of kind of the ground rules for  
19   today, but we'll go over a few of the  
20   important ones, okay, and let me know if you  
21   don't understand any.

22                               Okay?

23                   A.       Okay.

24                   Q.       The first and probably most  
25   important is just to let me finish my

1           Q.       When did you graduate high  
2   school?

3           A.       1987.

4           Q.       So you went to work for Walmart  
5   after graduating high school; is that  
6   correct?

7           A.       Correct.

8           Q.       What was your first job at  
9   Walmart?

10          A.       I was an order filler.

11          Q.       And where was -- where were you  
12   located at that time?

13          A.       Plainview, Texas.

14          Q.       And how long did you -- strike  
15   that.

16                   What was your next job at  
17   Walmart after an order filler?

18          A.       I loaded trailers.

19          Q.       What do you mean by "loaded  
20   trailers"?

21          A.       I physically loaded  
22   televisions, dog food, paint, into a trailer,  
23   floor-loaded it.

24          Q.       Was that at a Walmart  
25   distribution center?

1 Q. And then what was the change in  
2 2008?

3 A. I moved over to the pharmacy.

4 Q. And what was your title in  
5 2008?

6 A. I was senior manager on the  
7 pharmacy team.

8 Q. Was that your title in 2008,  
9 senior manager in the pharmacy team?

10 A. I don't know what it said.

11 Q. What were your duties and  
12 responsibilities in connection with that  
13 role?

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

14 MS. FUMERTON: Zach, we've been  
15 going for about an hour. Would it be  
16 okay --

17 MR. BOWER: Can we just have a  
18 few minutes just to round out her  
19 employment history and then we'll --

20 MS. FUMERTON: Sure.

21 MR. BOWER: I just wanted -- so  
22 we can switch topics after the break.

23 QUESTIONS BY MR. BOWER:

24 Q. So you held this position  
25 beginning in 2008 where you were senior

1 manager for the pharmacy team.

2 How long did you hold that  
3 position?

4 A. That's what I currently do.

5 Q. You still have that -- what's  
6 your current title?

7 A. Senior manager, department  
8 supply chain. We just changed it from  
9 logistics to supply chain.

10 MR. BOWER: It might take a  
11 little longer to go through subsequent  
12 duties and responsibilities, so why  
13 don't we take a break and we can  
14 finish up after.

15 MS. FUMERTON: Okay.

16 VIDEOGRAPHER: Going off the  
17 record at 8:33 a.m.

18 (Off the record at 8:33 a.m.)

19 VIDEOGRAPHER: We're back on  
20 the record at 8:47 a.m.

21 QUESTIONS BY MR. BOWER:

22 Q. Okay. I just want to finish  
23 up, hopefully fairly briefly, your roles at  
24 Walmart.

25 So from 2008 to the present,



■ [REDACTED]

2 Q. Do you know what ARCOS is?

3 A. Yes.

4 Q. What is ARCOS?

5 A. Sales and purchases.

6 Q. Do you know whether Walmart  
7 reports information to the DEA?

8 A. Yes.

9 Q. Do you know how Walmart reports  
10 that information?

11 A. They report it monthly.

12 Q. And who creates the reports?

13 A. It's created through a job in  
14 the system, so it's an automatic report that  
15 gets put on a server. We take that data and  
16 upload it into the DEA's website.

17 Q. And who has the responsibility  
18 at Walmart to physically do the uploading of  
19 the data?

20 A. There was an individual on our  
21 team that did that.

■ [REDACTED] ■ [REDACTED]

■ [REDACTED]

■ [REDACTED] ■ [REDACTED]

■ [REDACTED] [REDACTED]